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Attorney for Defendant
GABRIEL ZENDEJAS-CHAVEZ

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GABRIEL ZENDEJAS-CHAVEZ (3).,

Defendant.

No. CR 18-173-GW

DEFENDANT CHAVEZ'S STATEMENT OF
THE CASE

Location: Courtroom of the
Hon. George Wu

Defendant Gabriel Zendejas-Chavez, by and through his counsel of record, Meghan Blanco, files the instant proposed statement of the case.

Dated: July 23, 2022

Respectfully submitted,

/s/

MEGHAN BLANCO
Attorney for Defendant
GABRIEL ZENDEJAS-CHAVEZ

1 STATEMENT OF THE CASE -- DEFENSE

2 The First Superseding Indictment ("Indictment") charges Gabriel
3 Zendejas-Chavez with violations of federal criminal law. The
4 Indictment is not evidence. Mr. Zendejas-Chavez has entered a plea
5 of not guilty and is presumed innocent of the charges against him.
6 The Indictment alleges that Mr. Zendejas-Chavez conspired with others
7 to conduct or to participate in the affairs of the Mexican Mafia's
8 Los Angeles County Jail System ("LACJ") Enterprise through a pattern
9 of racketeering activity, including acts involving extortion and drug
10 trafficking.

11 Mr. Zendejas-Chavez is a defense attorney. The Indictment
12 alleges that Mr. Zendejas-Chavez acted as a facilitator, that is, a
13 highest-level associate, for two Mexican Mafia members who controlled
14 the Mexican Mafia LACJ Enterprise and would act with the authority of
15 those members in directing the criminal activities of the Mexican
16 Mafia LACJ Enterprise, including extortion and drug sales. In
17 particular, the Indictment alleges that Mr. Zendejas-Chavez would use
18 his position as an attorney to assist Mexican Mafia Member Jose
19 Landa-Rodriguez, another now-deceased Mexican Mafia member, and other
20 members of the LACJ Enterprise, with criminal activities.

21 Mr. Zendejas-Chavez is charged in four counts of the Indictment.
22 Count One charges Mr. Zendejas-Chavez with conspiring to violate the
23 federal Racketeer Influenced and Corrupt Organizations Act, also
24 known as "RICO."

25 Count Five charges Mr. Zendejas-Chavez with conspiring to
26 distribute methamphetamine, heroin, cocaine, and marijuana. Count
27 Five further alleges that the overall conspiracy, to which Mr.
28 Zendejas-Chavez is alleged to have been a member, involved the

1 following:

- 2 (1) at least 500 grams of a mixture and substance containing a
- 3 detectable amount of methamphetamine;
- 4 (2) at least 50 grams of methamphetamine;
- 5 (3) at least 100 grams of a mixture and substance containing a
- 6 detectable amount of heroin;
- 7 (4) cocaine; and
- 8 (5) marijuana

9 Count Seven charges Mr. Zendejas-Chavez with aiding and abetting
10 the possession with intent to distribute of approximately 7.75 grams
11 of methamphetamine.

12 Count Eight charges Mr. Zendejas-Chavez with aiding and abetting
13 the possession with intent to distribute of approximately 2.37 grams
14 of a mixture and substance containing a detectable amount of heroin.

15 Once again, the Indictment is not evidence. Mr. Zendejas-Chavez
16 has entered a plea of not guilty and is presumed innocent of the
17 charges against him.